

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs

Case No. 21-20354
HONORABLE PAUL D. BORMAN

TERRY DOUGLAS,

Defendant.

/

**REQUESTS AND NOTICES IN COMPLIANCE WITH
STANDING ORDER FOR DISCOVERY AND INSPECTION**

In compliance with the Standing Order for Discovery and Inspection entered in this case, and Rule 16 of the Federal Rules of Criminal Procedure, Defendant Deaunta Belcher, through his attorneys John A. Shea and John R. Martin, hereby provides the Government with the following requests and notices:

1. It is hereby requested that the Government provide copies or an opportunity to make copies of:

(a) Any information within the meaning of the "Standing Order," paragraph 1(a) and/or Rule 16(a)(1) of the Federal Rules of Criminal Procedure.

(b) Any exculpatory evidence within the meaning of the Standing Order," paragraph 1(b) and/or Brady v. Maryland, 373 U.S. 83 (1963) and United States v. Agurs, 427 U.S. 97 (1976).

(c) Any document which will be used to refresh the memory of a witness within the meaning of the "Standing Order", paragraph 8 and/or Rule 612 Federal Rules of Evidence.

(d) Any statement by persons who have possible knowledge or information relative to this case which are not protected from disclosure by 18 U.S.C. Sec. 3500.

(e) Any statement of witnesses within the meaning of 18 U.S.C. Sec. 3500(e).

2. Notice is hereby given pursuant to the "Standing Order," paragraph 5(b), that the foundation for any and all exhibits will be contested, and paragraph 6, that the chain of their custody will be contested.

3. Notice is hereby given pursuant to the "Standing Order," paragraph 7, that any scientific analysis or summary testimony by experts will be contested.

4. All requests for information, materials, or evidence contained herein are continuing ones and the prosecution is expected to immediately provide any additional information, materials, or evidence as required by the "Standing Order," paragraph 3 and/or Rule 16(c) of the Federal Rules of Criminal Procedure.

5. Notices contained herein will remain in effect unless expressly withdrawn.

Dated: July 12, 2021

s/John A. Shea
John A. Shea (P37634)
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on July 12, 2021, he electronically filed a copy of Defendants' *Requests and Notices in Compliance with Standing Order for Discovery and Inspection*. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

Dated: July 12, 2021

s/John A. Shea

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